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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JANET GARCIA, GLADYS ZEPEDA,  
MIRIAM ZAMORA, ALI EL-BEY, PETER  
DIOCSO JR., MARQUIS ASHLEY, JAMES  
HAUGABROOK, individuals, Ktown for  
ALL, an unincorporated association,  
ASSOCIATION FOR RESPONSIBLE and  
EQUITABLE PUBLIC SPENDING an  
unincorporated association,

*Plaintiffs,*

vs.

CITY OF LOS ANGELES, a municipal entity;  
DOES 1-50,

*Defendant(s).*

Case No.: 2:19-cv-6182-DSF-PLA  
Assigned to Judge Dale S. Fischer

**DECLARATION OF JOSE  
RODRIGUEZ ISO DEFENDANT  
CITY OF LOS ANGELES'  
OPPOSITION TO MOTION FOR  
PRELIMINARY INJUNCTION**

**Concurrently Filed Documents:**

- Memorandum of Points & Authorities ISO Opposition
- Declarations ISO Opposition: Dermer, Wong, Pereida, Ramirez, Rankin, Guerrero, Haines, Medina, Banks, Bernal, Rodriguez, Diaz
- Request for Judicial Notice
- Evidentiary Objections

**Date:** March 30, 2020  
**Time:** 1:30 p.m.  
**Ctrm:** 7D

**DECLARATION OF JOSE RODRIGUEZ**

I, JOSE RODRIGUEZ, hereby declare:

1. I currently work in the Office of Los Angeles City Councilmember Gil Cedillo, who represents the First Council District, which covers all or parts of the Los Angeles neighborhoods of Glassell Park, Cypress Park, Highland Park, Mt. Washington, Sycamore Grove, Solano Canyon, Elysian Park, Echo Park, Westlake, Angelino Heights, Temple Beaudry, Chinatown, Forgotten Edge, Lincoln Heights, Montecito Heights, Pico Union, Adams-Normandie, University Park, Victory Heights, Koreatown, Mid Cities, and Mac Arthur Park. I am the Deputy District Director for the First District. I have worked for the City of Los Angeles since 2008, and have been working for the First District since 2013. I have personal knowledge of the facts contained herein, and if called to testify I could and would do so competently.

2. In my role as Deputy District Director for the First District, I am assigned the duties of handling public works, coordinating our homeless assistance strategy and public safety efforts. As the liaison between district field staff and Bureau of Sanitation, I receive community and staff complaints and concerns about bulky items left in the public right of way. I either guide the staff and community on how to report and resolve the issue or report and resolve the issue myself.

3. I have personally, on numerous occasions during my tenure with the First District's office, observed big items that are larger than could fit in a 60-gallon container with the lid closed obstructing sidewalks throughout our District, including on routes to and around elementary schools. Even in instances where the large items do not entirely block access, the obstructions can make it difficult for pedestrians to pass. This is particularly problematic when children walking to school are accompanied by a parent with a younger child in a stroller, or an elderly grandparent, and they are all forced to walk along the street curb or next to parked cars in the street to navigate around large items obstructing the sidewalks.

4. In addition, I have personally observed big items that are larger than could

1 fit in a 60-gallon container with the lid closed in and around homeless encampments in  
2 alleys within our District. The accumulation of such large items can make it difficult to  
3 pass through these alleys, and can make it more onerous for trash collectors to service the  
4 trash bins in those alleys.

5 5. The First District is the most densely populated district in Los Angeles, with  
6 the highest number of Mexican and Latin American immigrants who speak Spanish only.  
7 I have learned from constituents that this prevents many such individuals within our  
8 District from calling 311 to report issues, including the presence of furniture and other  
9 big items that are larger than could fit in a 60-gallon container with the lid closed, which  
10 are frequently left in the public rights of way within our District. Despite these  
11 challenges, I have personally received reports from constituents of the concerns outlined  
12 in Paragraphs 3 and 4 above.

13 6. Our office works proactively to identify alleys and other locations that have  
14 chronic and recurring issues with oversized items in the public right of way that are larger  
15 than could fit in a 60-gallon container with the lid closed. We also work proactively to  
16 report the presence of those items in the public rights of way throughout our District to  
17 Los Angeles Sanitation so that those items can be removed to prevent interruption of  
18 important services to residents, and to ensure that sidewalks, streets, and alleys are clean  
19 and free of oversized obstructions.

20 I declare under penalty of perjury under the laws of the State of California and the  
21 United States that the foregoing is true and correct, and that this Declaration was  
22 executed on March 6th, 2020, at Los Angeles, California.

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